

KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | SUITE 7110
NEW YORK, NEW YORK 10118
TEL (212) 763-0883 | FAX (212) 564-0883
WWW.KAPLANHECKER.COM

DIRECT DIAL 929.294.2540
DIRECT EMAIL jdabbs@kaplanhecker.com

October 2, 2020

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

RE: United States v. Arguedas *et al.* (Denise Bullock), 20 Cr. 135 (JMF)

Dear Judge Furman:

We write respectfully to seek a single modification of the conditions of defendant Denise Bullock's pretrial release. Ms. Bullock requests that she be permitted to relocate her home incarceration from her current location on Staten Island to the home of her paternal aunt in East Flatbush, Brooklyn. The government does not oppose this request. Pretrial Services has Ms. Bullock's paternal aunt's name and contact information for supervision purposes in the event Your Honor grants this request.¹

On September 15, 2020, Your Honor granted Ms. Bullock's motion for conditional pretrial release and approved her proposed condition of home incarceration at the residence of a maternal aunt on Staten Island. (*See* ECF 224.) Ms. Bullock has served the first several weeks of her pretrial home incarceration without incident. But conditions at this residence have proven to be inconvenient for an extended period of pretrial home incarceration, including because of noise and shared quarters that frustrate Ms. Bullock's ability to meaningfully communicate with her counsel about her defense.

Counsel have worked with Ms. Bullock's extended family to identify a suitable alternative location. Ms. Bullock's paternal aunt, a healthcare worker and temporary Census employee, is close with Ms. Bullock and is eager to provide a safe location for a productive period of conditional pretrial release. Counsel has spoken extensively with Ms. Bullock's paternal aunt about the circumstances of this case and the full implications of Ms. Bullock's

¹ We have omitted Ms. Bullock's paternal aunt's name and address from this filing to protect her privacy, but have made that information available to the government and to Pretrial Services. We will, of course, provide this information to the Court if useful or necessary.

KAPLAN HECKER & FINK LLP

conditions of pretrial release. Her paternal aunt understands the significance of offering to host Ms. Bullock's home incarceration, and confirmed her willingness to do so via an email to counsel on September 30, 2020.

Relocation to her paternal aunt's East Flatbush residence would also put Ms. Bullock closer to the Court for appearances, closer to her three New York City-resident children, and closer to her lawyers' office for pretrial preparation. We respectfully ask that the Court grant this request.

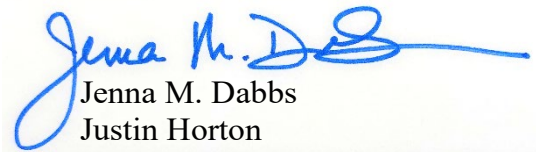
Thank you for your consideration of this matter.

Respectfully submitted,

Application GRANTED. The Clerk of Court is directed to terminate Doc. #232. SO ORDERED.



October 2, 2020



Jenna M. Dabbs

Justin Horton

Brandon C. Thompson

KAPLAN HECKER & FINK LLP

350 Fifth Avenue, Suite 7110

New York, New York 10118

Telephone: (212) 763-0883

Facsimile: (212) 564-0883

jdabbs@kaplanhecker.com

jhorton@kaplanhecker.com

bthompson@kaplanhecker.com

Counsel for Denise Bullock

cc: AUSAs Danielle Sassoon, Andrew Chan, and Brandon Harper (via ECF)
PSO Bernisa Mejia (via email)